

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER  
LEO-GUERRA, MICHAEL MAERLENDER,  
BRANDON PIYEVSKY, BENJAMIN SHUMATE,  
BRITTANY TATIANA WEAVER, and  
CAMERON WILLIAMS, individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA  
INSTITUTE OF TECHNOLOGY, UNIVERSITY  
OF CHICAGO, THE TRUSTEES OF COLUMBIA  
UNIVERSITY IN THE CITY OF NEW YORK,  
CORNELL UNIVERSITY, TRUSTEES OF  
DARTMOUTH COLLEGE, DUKE UNIVERSITY,  
EMORY UNIVERSITY, GEORGETOWN  
UNIVERSITY, THE JOHNS HOPKINS  
UNIVERSITY, MASSACHUSETTS INSTITUTE  
OF TECHNOLOGY, NORTHWESTERN  
UNIVERSITY, UNIVERSITY OF NOTRE DAME  
DU LAC, THE TRUSTEES OF THE  
UNIVERSITY OF PENNSYLVANIA, WILLIAM  
MARSH RICE UNIVERSITY, VANDERBILT  
UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No.: 1:22-cv-00125

**Hon. Matthew F. Kennelly**

**[PROPOSED FORM #2: GLOSSARY] ORDER REGARDING PLAINTIFFS'  
MOTION TO COMPEL AND FOR SANCTIONS AGAINST GEORGETOWN  
UNIVERSITY AND ITS COUNSEL AND FOR RELATED RELIEF**

Pending before the Court is Plaintiffs' Motion To Compel And For Sanctions Against  
Georgetown University And Its Counsel And For Related Relief (ECF 412). Upon consideration  
of the said Motion and the Joint Status Report of Plaintiffs and Georgetown to Resolve

Plaintiffs' Motion to Compel and for Sanctions filed on July 31, 2023, the Court enters the following Order:

1. Georgetown shall produce all [REDACTED]  
[REDACTED] no later than August 15, 2023.

2. Georgetown shall a confidential glossary and code with UUIDs, as follows:

A. Georgetown shall create a confidential glossary that Georgetown's counsel would share with Georgetown witnesses, but not with Plaintiffs or anyone else, linking the UUIDs of [REDACTED]s to true names. In order for this idea to be effective, Georgetown shall:

B. Search for and produce all [REDACTED]  
[REDACTED]  
[REDACTED]

(i) the names of [REDACTED]s would be replaced by a unique identifier ("UID") even if there is no UID in structured data that Georgetown produced; and

(ii) after the UID, the names of any [REDACTED]  
[REDACTED], correlated to the UID of the applicant (e.g. if UID 1234 was the named applicant, UID 1234 [REDACTED]);

C. Identify the donation history and any then-current donation, pledge or assessment of gift capacity, for every donor and potential donor [REDACTED]

[REDACTED];

D. Search the President's and Advancement Offices and produce not only [REDACTED]

[REDACTED]

[REDACTED], including any notes, memoranda or recordings of conversations that relate to those matters; and

E. For each [REDACTED], identify the ultimate admission decision reached – i.e. admit, deny, wait list, or deferred admission (such as will be admitted after satisfactory completion of one year at another institution).

3. Georgetown shall designate John DeGioia as custodian for all purposes; and the head of the Advancement Office as *limited* custodian with regard to [REDACTED]

[REDACTED]

[REDACTED];

and Plaintiff's First Set of RFPs Nos. 23, 24, 46, 54, 55, 58, 62, 63, 80, 82, 124, 126, 127, 128, 129, and 130; and Third Set of RFPs No. 11.

4. Georgetown's counsel shall submit a Declaration on the possible

[REDACTED] no later than

August 15, 2023.

SO ORDERED:

Dated: \_\_\_\_\_

\_\_\_\_\_  
Hon. Matthew F. Kennelly  
United States District Judge